

April 28, 2016

Via Hand Delivery

Mr. Mark Suarez
U.S. Environmental Protection Agency
Office of Pesticide Programs (MC 7505P)
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: EPA Reg. No. 91601-R: Revised CSF and Related Justifications

Dear Mr. Suarez:

The Acta Group (Acta[®]) on behalf of SenesTech, Inc. (SenesTech) is pleased to submit the following volume to supplement the pending registration application for ContraPest[®], EPA Reg. No. 91601-R:

Vol.	Guideline No.	Study Report Title	MRID No.
1	830.1750	<i>Certified Limits, Supplement to MRID 49700116, Report No. 6002-001-25</i>	49908801

As a follow up to recent label and Confidential Statement of Formula (CSF) discussions, this volume makes a small revision to the nominal concentration for 4-vinylcyclohexene diepoxide (VCD) in the formulated product, so that the CSF conforms with the proposed label. This volume also compiles in one place the justifications for the slightly revised VCD nominal concentration and the VCD lower certified limit; the justification for the latter also was contained in Master Record Identification (MRID) 49893401, submitted on April 12, 2016.

Due to the low concentrations of active ingredients, we have been uncertain how best to manage significant digits on the CSF. SenesTech would be pleased to speak directly with the chemistry reviewer if there are any continuing issues in this regard.

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2200 Pennsylvania Avenue, N.W.
Suite 100W
Washington, D.C. 20037
TEL: 202/266-5020
FAX: 202/557-3836

Registered in Hong Kong No. 1749173
Registered office: Unit 2508A
25/F Bank of America Tower
12 Harcourt Road Central
Hong Kong

Brook House Suite 2B
64-72 Spring Gardens
Manchester M2 2BQ
United Kingdom
+44 (0) 330 223 0610 - Main

Registered in England and Wales, No. 5307852
Registered office: The Acta Group EU, Ltd
1st Floor, Northern Assurance Buildings,
921 Princess Street, Manchester M2 4 DN

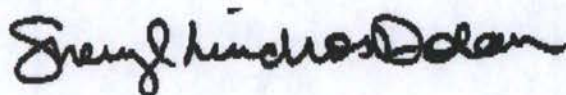
Mr. Mark Suarez

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As always, please contact me at (202) 266-5031 or sdolan@actagroup.com if you have any questions or comments regarding this letter and attachments.

Sincerely,

A handwritten signature in black ink that reads "Sheryl L. Dolan". The signature is written in a cursive, flowing style.

Sheryl L. Dolan

Attachment